

From: Lynelle Marolf
To: innesj@DEQ-SC.DEQ-SHIAWASSEE,
Date: Mon, Jan 25, 1999 9:04 am
Subject: Linden Road Landfill GW Waiver -Reply

Jim, I discussed this issue with Al and we concluded that we would not require any waiver for this RAP, provided that you are confident that the groundwater data presented by GM is adequate to document that groundwater contamination is attributable to the off-site source.

I asked in my previous reply whether there are special circumstances at this landfill that make it plausible that it's not having a groundwater impact. Please let me know what you think about this.

If you conclude that the data supports the off-site source theory, then the RAP review form (and the administrative record in general) should clearly indicate how this decision was made. Please revise the forms accordingly before sending them down for signature.

Thanks!
Lynelle

>>> James Innes 1/12/99 4:20 pm >>>

Lynelle,

I discussed the GW waiver we spoke of this morning with Bob Metcalf at GM. Although groundwater under the Western portion of the Landfill has consistently been contaminated above GRCC, he contends the source of the contamination is up gradient of the Linden Road Landfill, namely the Dye Road Dump.

Review of groundwater data appears to confirm Bob's assertion. Groundwater flow direction is toward the East. The monitoring wells with consistent groundwater contamination above GRCC are located at the far Western edge of site. The Dye Road Dump lies directly to the West of the Linden Road Landfill. Although no groundwater investigation has ever been done at Dye Road Dump, we do know the site is littered with drums of waste (the focus of an upcoming bond \$ removal project). Other on-site groundwater wells have had sporadic hits just above GRCC for different compounds, but none of these were confirmed in subsequent sampling.

If you concur, I will ask Bob to submit a formal request for a groundwater migration exemption, with backup documentation, for our review. Let me know what you think

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